

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Birim Group, LLC, a California Limited Liability Company, Assignee,	)	
	)	
	)	
Plaintiff,	)	Case No. 20-cv-7198
	)	
v.	)	Honorable Thomas R. Durkin
	)	
Paa Kwesi Nduom, a.k.a Dr. Paa Kwesi Nduom,	)	
Papa Kwesi Nduom, Kwesi P. Nduom, an	)	
Individual, et al.,	)	
	)	
Defendants.	)	

**CERTAIN DEFENDANTS' MOTION TO DISMISS**

Paa Kwesi Nduom, GN Bank, an Illinois Federally-Chartered Financial Institution, International Business Solutions, LLC, Groupe Nduom USA, LLC, GN Money, LLC, Yvonne Nduom, Nana Kweku Nduom, Edjah Nduom, Nana Aba Nduom, Robert Klamp, James L. Buckner, Lisa Finch, Francis Baffuor, William C. Goodall, and Donald Davidson, by their undersigned counsel, hereby move this Court pursuant to Fed. R. Civ. P. 12(b)(6), for entry of an order dismissing Plaintiff Birim Group's complaint.

The bases for this motion are more fully set forth in the accompanying Memorandum in Support.

Respectfully Submitted,

**Dr. Papa Kwesi Nduom,  
GN Bank, an Illinois Federally-Chartered  
Financial Institution,  
International Business Solutions, LLC,  
Groupe Nduom USA, LLC  
GN Money, LLC,  
Yvonne Nduom,  
Nana Kweku Nduom,  
Edjah Nduom,  
Nana Aba Nduom,**

**Robert Klamp,  
James L. Buckner,  
Lisa Finch,  
Francis Baffuor,  
William C. Goodall, and  
Donald Davidson**

By: /s/ Ricardo Meza  
One of their Counsel

Ricardo Meza (Atty. No. 6202784)  
Meza Law  
161 N. Clark Street, Suite 1600  
Chicago, IL 60601  
(312) 802-0336  
rmeza@meza.law

Robert M. Andalman (Atty. No. 6209454)  
Rachael Blackburn (Atty. No. 6277142)  
A&G Law LLC  
542 S. Dearborn St.; 10<sup>th</sup> Floor  
Chicago, IL 60605  
Tel.: (312) 341-3900  
Fax: (312) 341-0700

**CERTIFICATE OF SERVICE**

I, Ricardo Meza, an attorney, hereby certify that the foregoing **CERTAIN DEFENDANTS' MOTION TO DISMISS** was electronically filed on April 5, 2021 and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

/s/ Ricardo Meza \_\_\_\_\_

Ricardo Meza